

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CRIMINAL NO. 11-CR-30108-DRH
	)	
RICHARD J. KLEMIS,	)	
	)	
Defendant.	)	

**NOTICE OF EXPERT WITNESS**

The United States of America, by and through Stephen R. Wigginton, United States Attorney for the Southern District of Illinois, Robert L. Garrison, Assistant United States Attorney, hereby gives notice to the defense of its intent to call an expert witness in its case-in-chief at trial. The witness' name, opinions, the basis and the reasons therefor, and the witness' qualifications are set forth as follows:

1. Dr. James Thomas, D.O.

Dr. Thomas will testify that he treated Eric Schulze at St. Elizabeth's Hospital in Belleville, after Schulze arrived there by ambulance on September 30, 2010. As an expert in the field of medicine, Dr. Thomas is expected to give his opinions that:

- 1) Schulze's injuries created a substantial risk of death; and
- 2) Schulze's injuries resulted from an opiate overdose. Dr. Thomas will base

his opinions on:

- A) his examination of Schulze at St. Elizabeth's Hospital;
- B) Schulze's medical records generated by St. Elizabeth's Hospital on September 30, 2010 and shortly thereafter, and
- C) his years of training and experience as a medical doctor. Dr.

Thomas' qualifications and professional experience are set forth in Exhibit 5 hereto, and incorporated by reference. Eric Schulze's medical records from St. Elizabeth's Hospital have been previously delivered to the defense as part of discovery in this case.

2. In the event it becomes necessary for the Government to call additional expert witnesses, an additional notice will be sent.

Respectfully submitted,

STEPHEN R. WIGGINTON  
United States Attorney

*s/ Robert L. Garrison*  
ROBERT L. GARRISON  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2014, I caused to be electronically filed NOTICE OF EXPERT WITNESS with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

William D. Stiehl, Jr.

Respectfully submitted,

STEPHEN R. WIGGINTON  
United States Attorney

s/ Robert L. Garrison  
ROBERT L. GARRISON  
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